

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO UNITED STATES POSTAL SERVICE
(APWU/USPS-1)
(January 18, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

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APWU/USPS-1 In APWU/USPS-T4-7(d), we asked Witness Neri whether a certain exception to the normal service standards for particular customers but not others was consistent with 39 U.S.C § 403(c). This interrogatory was redirected to USPS for a response. In response, USPS stated that “[t]he Postal Service believes that the content of the request and supporting testimony that it filed in PRC Docket No. N2012-1 is consistent with 39 U.S.C. § 403(c).”

- a) Please explain how the Request and supporting testimony filed in PRC Docket No. N2012-1 relates to the exception identified in APWU/USPS-T4-7.
- b) Please provide the definition of “undue or unreasonable discrimination” and the definition of “undue or unreasonable preference” as used in making the determination that the “request and supporting testimony filed in PRC Docket No. N2012-1 is consistent with 39 U.S.C. § 403(c).”
- c) If the terms identified in subpart b) were not defined by the Postal Service, please explain why these terms were not defined.
- d) Please explain the rationale for the conclusion that the request and supporting testimony filed in this case conforms to 39 U.S.C. § 403(c).
- e) Please explain the rationale for the belief that the exception identified in APWU/USPS-T4-7 does not equate to either an “undue or unreasonable discrimination” against those mailers that the exception does not apply to or “undue or unreasonable preference” to those mailers that will receive overnight delivery per this exception.